

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re: Case No. 21-14384)
)
SHERICA R. CLAY,)
 Debtor,)
)
THE ILLINOIS DEPARTMENT OF) BK NO. 21-14384
EMPLOYMENT SECURITY,)
)
 Plaintiff,) ADV. PRO. NO. 22-00038
)
v.) Chapter 13
)
) HONORABLE JUDGE TIMOTHY A. BARNES
SHERICA R. CLAY,)
 Defendant.)

NOTICE OF MOTION

To: **Sherica R. Clay**, 15243 Ridgeway Ave., Midlothian, Illinois 60445 By U.S. MAIL
Megan Swenson, The Semrad Law Firm, 20 S. Clark St., 28th Floor, Chicago, IL 60603,
By U.S. MAIL

PLEASE TAKE NOTICE that on **May 26, 2022, at 2:00 p.m.**, I will appear before the Honorable Judge Timothy A. Barnes, or any judge sitting in that judge's place, and present the motion of Plaintiff, The Illinois Department of Employment Security Motion for Default and Default Judgment, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is **161 329 5276** and the password is **433658**. The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

/s/ Andrew L. Dryjanski
ANDREW L. DRYJANSKI
Assistant Attorney General
33 South State St. - Suite 992
Chicago, Illinois 60603
(312) 793-9210
Andrew.Dryjanski@Illinois.gov

CERTIFICATION OF SERVICE

I, ANDREW L. DRYJANSKI, an attorney, certify that I caused a copy of the above Notice and attached Motion for Default and Default Judgment to be served upon the above listed party by first class mail, postage prepaid, May 17, 2022, before the hour of 5:00 p.m.

/s/ Andrew L. Dryjanski
ANDREW L. DRYJANSKI
Assistant Attorney General

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re: Case No. 21-14384)
)
SHERICA R. CLAY,)
 Debtor,)
)
THE ILLINOIS DEPARTMENT OF) BK NO. 21-14384
EMPLOYMENT SECURITY,)
)
 Plaintiff,) ADV. PRO. NO. 22-00038
)
)
v.) Chapter 13
)
) HONORABLE JUDGE TIMOTHY A. BARNES
SHERICA R. CLAY,)
 Defendant.)
)

MOTION FOR DEFAULT AND DEFAULT JUDGMENT

Plaintiff, ILLINOIS DEPARTMENT OF EMPLOYMENT SECURITY ("IDES") by its attorney, KWAME RAOUL, Illinois Attorney General, pursuant to Federal Rule of Bankruptcy Procedure 7055 which incorporates by reference Federal Rule of Civil Procedure 55, hereby moves this court for entry of a default judgment on the verified complaint in the above matter against defendant, SHERICA R. CLAY. In support therefor, IDES states as follows:

1. IDES' adversary Complaint to Determine Dischargeability of Debt, filed on March 9, 2022, sets forth the averments which entitle it to the judgment prayed for therein. A copy of the complaint is attached hereto as Exhibit "A".
2. On March 9, 2022, IDES filed its certificate of service on defendant, a copy of which is attached hereto as Exhibit "B".
3. To date, defendant has failed to respond to the complaint.

4. The defendant's failure to plead responsive to the allegations of the compliant, constitutes an admission thereof pursuant to Bankruptcy Rule 7008 which incorporates by reference Federal Rule of Civil Procedure 8.

5. Pursuant to Federal Rule C.P. 55(b)(2) attached is an affidavit (Exhibit "C") establishing the amount due herein.

6. On May 17, 2022, the Illinois Attorney General's Office received the Military Status Report from the United States Department of Defense, the report states that the defendant, SHERICA R. CLAY is not currently on active military duty. Attached is an affidavit (Exhibit "D").

WHEREFORE, IDES requests that defendant be defaulted, and judgment entered as prayed for in the Verified Complaint to Determine Dischargeability of Debt: that judgment is entered in favor of plaintiff and against defendant in the sum of \$20,554.00 plus costs and the same is non-dischargeable under 11 U.S.C. 523(a)(2).

Respectfully submitted,
KWAME RAOUL
ATTORNEY GENERAL
STATE OF ILLINOIS

BY: /s/ Andrew L. Dryjanski
ANDREW L. DRYJANSKI
Assistant Attorney General

KWAME RAOUL
ATTORNEY GENERAL
STATE OF ILLINOIS

ANDREW L. DRYJANSKI
Assistant Attorney General
33 S. State Street-Suite 992
Chicago, Illinois 60603
(312) 793-9210
Andrew.Dryjanski@Illinois.gov